

Appln No. 10/760,248
Amdt. Dated February 3, 2006
Response to Office Action of December 23, 2005

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REMARKS/ARGUMENTS

In response to the Examiner's first Office Action of December 23, 2005 the Applicant respectfully submits the accompanying Amendment to the claims and the below Remarks.

Regarding Amendment

In the Amendment:

independent claims 1 and 4 are amended to specify that the shield is arranged alongside a printing surface of the printhead so as to protect the printhead from contact with paper upon insertion of the cartridge into the cradle. Support for this amendment can be found, for example, at page 7, lines 5-18 and page 25, lines 9-15 and in Figs. 5 and 9 of the present application; and

dependent claims 2 and 3 are unchanged.

It is respectfully submitted that the above amendments do not add new matter to the present application.

Regarding 35 USC 102(b) Rejections

Initially, it is noted that Silverbrook et al. (US 6,755,513) is only applicable under 35 USC 102(e), not 102(b) as indicated by the Examiner, and the number indicated for Silverbrook et al. is incorrect in the text of the Office Action but is correct in the Notice of References cited which accompanies the Office Action.

It is respectfully submitted that the subject matter of amended independent claim 1, and 2 dependent therefrom, is not disclosed by Silverbrook et al., for at least the following reasons.

In the present invention, the air coverplate 54 is positioned alongside the printhead chip surface 52 so that it may prevent direct contact of paper and/or dust/debris with the delicate nozzles of the printhead. This arrangement provides a simple, yet effective shield for the printhead (see page 7, lines 5-18 and page 25, lines 9-15 and in Figs. 5 and 9 of the present application). Independent claims 1 and 4 have been amended to clarify this arrangement of the present invention.

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On the other hand, the shield plate 5 disclosed by Silverbrook et al. (which is used by the Examiner as the claimed shield) is assembled over the printing surface of the printhead segments 4, such that slots 6 are required in the shield plate so that the printhead segments may eject ink therethrough onto the passing media surface 2 (see col. 5, lines 2-67 and Fig. 1 of Silverbrook et al.).

Thus, unlike the shield of the claimed invention, the shield plate of Silverbrook et al. is an integral part of the printing surface, where careful alignment of the shield plate and printhead segments is required during assembly.

Thus, the subject matter of amended independent claims 1 and 4, and dependent claims 2 and 3, is not disclosed, or suggested, by Silverbrook et al.

Regarding 35 USC 103(a) Rejections

It is respectfully submitted that the subject matter of dependent claim 3 and amended independent claim 4 is not taught or suggested by Silverbrook et al. in view of Silverbrook (US 6,893,109), for at least the following reasons.

Like Silverbrook et al., Silverbrook discloses a nozzle guard 43 which overlies the print chip surface 27 for protecting the print chips from dust. The nozzle guard is provided with micro-apertures 44 through which the print chips eject ink onto print media. It is noted that "element 36" used by the Examiner as the claimed shield, is the laminated stack of Silverbrook which is used to distribute ink and air to the print chips, not a shield as claimed in the claimed invention (see col. 5, lines 9-20 and col. 7, lines 3-16 and Fig. 9b of Silverbrook).

Thus, similar to Silverbrook et al. discussed above, the nozzle guard of Silverbrook is an integral part of the printing surface, where careful alignment of the nozzle guard and print chips is required during assembly.

Thus, the subject matter of amended independent claims 1 and 4, and dependent claims 2 and 3, is not taught or suggested by Silverbrook et al. or Silverbrook either taken alone or in combination.

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It is respectfully submitted that the Examiner's rejections have been traversed. Accordingly, it is submitted that the present application is in condition for allowance and reconsideration of the present application is respectfully requested.

Very respectfully,

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